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December 21, 2023

**BY ECF**

The Honorable Stephanie A. Gallagher  
United States District Judge  
United States District Court, District of Maryland  
101 West Lombard Street, Chambers 7C  
Baltimore, MD 21201

Re: **State of Maryland v. Exxon Mobil, et al., Case No. 1:18-cv-00459-SAG**

Dear Judge Gallagher:

The Parties have conferred in accordance with the Court's December 11, 2023 Order (ECF No. 755) and jointly submit this letter report.

1. **Next Status Conference**

The Parties are available for the next scheduled conference on January 31, 2024, at 9:15 a.m., and will submit a status update and summary of any disputed issues to the Court a week in advance, as directed.

2. **Schedule and Deadline to Complete All Focus Site Depositions**

Consistent with the Court's Order, the parties have met and conferred regarding the scheduling of the depositions for the Focus Sites, including a deadline for the completion of those depositions. The Parties conferred regarding both an overall deadline and commitments for the number of depositions to be completed each month, so as to avoid compressing depositions into the end of the schedule. Defendants proposed that the Parties complete a minimum of seven to eight Focus Site depositions of Plaintiff per month. However, Plaintiff believes that three to five depositions per month is the feasible rate for it to prepare and produce witnesses. Accordingly, after further conferral, Defendants accepted Plaintiff's proposal to conduct at least three to five Focus Site depositions of Plaintiff per month and, in light of those numbers, the Parties agreed to complete all Focus Site depositions—of Plaintiff and Defendants—by December 18, 2024. A proposed order memorializing this schedule and deadline is attached.

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3. Plaintiff's Identification of Focus Sites and Defendants for Deposition

The Court directed Plaintiff to provide Defendants with a list of Focus Sites for which it intends to take a deposition and, for each such site, the Defendant(s) it intends to depose for that site. Plaintiff will be providing that information to Defendants tomorrow.

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The Parties are available to answer any questions the Court may have and wish Your Honor and all Court personnel a happy holiday season.

Respectfully submitted,

/s/ James A. Pardo

James A. Pardo  
McDermott Will & Emery LLP

*Counsel for Exxon Mobil Corporation  
and on behalf of all Defendants of Record*

Respectfully submitted,

/s/ Yechiel M. Twersky

Yechiel M. Twersky  
Berger Montague PC

*Special Counsel for the State of Maryland*

cc: All Counsel of Record by ECF